

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
)
)
)
v.)
)
)
BENJAMIN MARTINEZ)

No. 03:13-cr-00055-2
Hon. Aleta Trauger

Motion GRANTED conditioned upon the timely filing of waivers of speedy trial by all defendants.

Otto A. Baumgarten

MOTION TO CONTINUE TRIAL

The undersigned, Benjamin Martinez, by and through undersigned counsel, having been advised of my rights under the Speedy Trial Act, 18 U.S.C. 3161, et seq. and the Plan For Prompt Disposition of Criminal Cases adopted by this Court, hereby requests a continuance of the date for trial.

The defendant is in the process of finalizing a plea agreement with the government and respectfully requests additional time for that purpose, in light of the seriousness of the case.

AUSA McDonough has stated to counsel that the government does not oppose a continuance of the trial date.

Defendant's waiver of speedy trial shall be filed promptly.

Respectfully submitted,
s/ William I. Shockley,
Attorney for Defendant
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